

United States District Court
for the
Eastern District of New York

FREEDOM
CORPORATION

MORTGAGE)

) Civil Action No. 23-cv-01025

Plaintiff)

)

)

)

v.) NOTICE OF MOTION

)

)

DONALD MULLIGAN, JR.,)
MAIDENBAUM & STERNBERG LLP)
FKA ROSENFELD & MAIDENBAUM
LLP)

)

Defendant(s)

PLEASE TAKE NOTICE that upon the instant Motion and Declaration in support of Gross Polowy LLC by Tracy M. Fourtner, Esq., Attorneys for Plaintiff dated January 26, 2024, and the exhibits attached thereto, and upon the Affidavit of Plaintiff dated January 5, 2024 in support of the motion, and upon all the proceedings in this case to date, the Plaintiff moves this Court, without oral argument, before the Hon. James M. Wicks at the United States District Court for the Eastern District of New York located at 100 Federal Plaza, Central Islip, NY 11722, for an order granting the following to the movant:

- (a) Order granting Default Judgment and Judgment of Foreclosure and Sale in the same form as attached hereto;
- (b) Granting such other and further relief this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE, Plaintiff will serve these motion papers on all Defendants pursuant to Fed. R. Civ. P. §55

DATED: January 26, 2024
Williamsville, New York

Gross Polowy LLC
/s/ Tracy M. Fourtner
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FREEDOM MORTGAGE CORPORATION

vs.

DONALD MULLIGAN, JR., et al.

Civil Action No.: 23-cv-01025

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